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a/k/a AZIM DeDREAM, and SEHER
QURESHI

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

METROPCS, a brand of T-MOBILE USA,
INC., a Delaware Corporation,

Plaintiff,

vs.

A2Z CONNECTION, LLC, a Nevada
limited liability corporation; A2Z LLC, a
Nevada limited liability corporation; AMIR
QURESHI a/k/a AMIER QURESHI, a/k/a
AMIER I. QURESHI, a/k/a AMIER F.
QURESHI, SR.; ASIM QURESHI a/k/a
ALEX QURESHI, a/k/a AZIM QURESHI
a/k/a AZIM DeDREAM, and SEHER
QURESHI,

Defendants.

Case No. 2:15-cv-01412-JAD-DJA

**STIPULATION AND PROPOSED
ORDER TO MODIFY BRIEFING
SCHEDULE ON PENDING MOTIONS
[ECF 166] [ECF 167] AND [ECF 168]
AND CONTINUE HEARING SET BY
MAGISTRATE**

Plaintiff, METROPCS a brand of T-MOBILE USA, INC., a Delaware Corporation
("METROPCS"), and Defendants, AMIR QURESHI a/k/a AMIER QURESHI, a/k/a AMIER I.
QURESHI, a/k/a AMIER F. QURESHI, SR.; ASIM QURESHI a/k/a ALEX QURESHI; a/k/a
AZIM QURESHI, a/k/a AZIM DeDREAM; and SEHER QURESHI ("Defendants") (hereinafter

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collectively referred to as the “Parties”), by and through their undersigned counsel, and pursuant to Local Rule IA 6-1 and 6-2, hereby jointly stipulate to an extension up to and including November 15, 2019 for Plaintiff to file their Opposition to Defendants’ Motion to Dismiss, in Part, Plaintiff’s Complaint [ECF No. 166]; an extension up to and including December 6, 2019 for Defendants to file their Opposition to Plaintiff’s Motion to Compel Defendants to Produce Electronic Discovery and for Sanctions and Memorandum of Law [ECF No. 167]; and an extension up to and including December 11, 2019 for Defendants to file their Opposition to Plaintiff’s Motion for Leave to File Documents Under Seal [ECF No. 168] and states as follows:

1. This extension is requested because the Parties are actively involved in settlement discussion.

2. On October 18, 2019, Defendants filed their Motion to Dismiss, in Part, Plaintiff’s Complaint [ECF 166]. Plaintiff’s Opposition to Defendants’ Motion to Dismiss is currently due November 15, 2019.

3. On October 23, 2019, Plaintiff filed its Motion to Compel Defendants to Produce Electronic Discovery and for Sanctions and Incorporated Memorandum of Law [ECF 167]. Defendants’ response is currently due by November 20, 2019.

4. On October 23, 2019, Plaintiff filed its Motion for Leave to File Documents Under Seal [ECF 168]. Defendants’ response is currently due by November 20, 2019.

5. The Parties have conferred and agree to allow the Plaintiff up to and including December 6, 2019 to file their Opposition to Defendants’ Motion to Dismiss, in Part, Plaintiff’s Complaint [ECF 166]. The Parties further agree to allow Defendants up to and including December 11, 2019 to file both their Opposition to Plaintiff’s Motion to Compel Defendants to Produce Electronic Discovery and for Sanctions and Incorporated Memorandum of Law and their Opposition to Plaintiff’s Motion for Leave to File Documents Under Seal.

6. The Parties have conferred and respectfully request this Court continue the hearing on motions [ECF 145], [ECF 153], [ECF 157], [ECF 167], and [ECF 168] until the week of January 6-10, 2020, or anytime thereafter at the Court’s convenience.

1 7. This is the second stipulation for an extension of time to file said documents; and
2 this is the first request for an extension of time to hearing the motions pending before this Court.

3 8. This extension is sought in good faith, and is not intended for purposes of delay nor
4 prejudice towards any party.

5 **WHEREFORE**, the Parties respectfully request that the Court enter this order extending:
6 Plaintiff's deadline to file their Opposition to Defendants' Motion to Dismiss, in Part, Plaintiff's
7 Complaint [ECF 166] from November 15, 2019 to **December 6, 2019**; Defendants' deadline to
8 file their Opposition to Plaintiff's Motion to Compel Defendants to Produce Electronic Discovery
9 and for Sanctions and Incorporated Memorandum of Law [ECF 167] from November 20, 2019 to
10 **December 11, 2019**; Defendant's Opposition to Plaintiff's Motion for Leave to File Documents
11 Under Seal [ECF 168] from November 20, 2019 to **December 11, 2019**; Hearing on motions [ECF
12 145], [ECF 153], [ECF 157], [ECF 167], and [ECF 168] from November 25, 2019 to **January 13**
13 **2020 at 1:00 p.m. in LV Courtroom 3A** and provide such other relief as is just and
14 proper.

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Respectfully submitted this 12th day of November, 2019.

SNELL & WILMER, LLP

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QURESHI

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 14, 2019